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Attorneys for Defendant
KEOLIS TRANSIT SERVICES, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KEITH BALZARINI,

Plaintiff,

v.

KEOLIS TRANSIT SERVICES, LLC, a
Delaware Nevada Limited Liability Company,

Defendant.

Case No. 2:24-cv-02054 -RFB-DJA

**STIPULATION AND ORDER TO
CONTINUE DEFENDANT KEOLIS
TRANSIT SERVICES, LLC'S
RESPONSIVE PLEADING DEADLINE**

Plaintiff KEITH BALZARINI ("Plaintiff") and Defendant KEOLIS TRANSIT SERVICES, LLC ("Defendant") (collectively, the "Parties") hereby stipulate, agree, and make joint application to continue Defendant's current responsive pleading deadline set forth in the waiver of service filed herein.

This is the first motion or stipulation to extend time for a party to file a responsive pleading, motion or other paper or take other action in this matter.

Pursuant to Local Rule IA 6-1, the Parties indicate that holiday travel of client contacts for Defendant and Defendant's counsel have slowed the review and filing of the responsive pleadings. Specifically, lead counsel for Defendant is traveling out of the country at the moment. Additionally, Defendant intend to concurrently file motions for admission *pro hac vice* of the attorneys who will be primarily responsible for this matter.

1 Counsel for Defendant realized the nature of the delay too late to make necessary
2 arrangements further in advance of the deadline for this stipulation. Defendant's counsel apologizes
3 to the Court for the delay in filing this stipulation.

4 Dated: January 2, 2025

LITTLER MENDELSON, P.C.

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7 /s/ Karyn M. Taylor

Karyn M. Taylor

8 Attorneys for Defendant
9 KEOLIS TRANSIT SERVICES, LLC

10 Dated: January 2, 2025

LAW OFFICES OOF MICHAEL P. BALABAN

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12 /s/ Michael P. Balaban

13 Michael P. Balaban

14 Attorneys for Plaintiff
15 KEITH BALZARINI
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~~[PROPOSED]~~ ORDER

The Court, having reviewed the stipulation of the Plaintiff Keith Balzarini and Defendant Keolis Transit Services, LLC and finding good cause for the same, orders that Defendant Keolis Transit Services, LLC's deadline for filing its responsive pleading is continued from January 3, 2025 to January 17, 2025.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: _1/3/2025